

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA**

WHEELING DIVISION

**DIANA MEY, individually
and on behalf of a proposed class,**

Plaintiff,

v.

Civil Action No. 5:19-cv-00237-JPB

**ALL ACCESS TELECOM, INC.;
BANDWIDTH INC.;
CENTURYLINK COMMUNICATIONS, LLC;
LEVEL 3 COMMUNICATIONS, LLC;
INTELIQUENT, INC.;
AFFINITY NETWORK INCORPORATED; and
TELIAX, INC.;**

Defendants.

**JOINT STIPULATION EXTENDING TIME
FOR PLAINTIFF TO FILE MOTIONS TO COMPEL REGARDING ALL
DEFENDANTS' RESPECTIVE DISCOVERY RESPONSES**

PLEASE TAKE NOTICE that Plaintiff and Defendants, through their below counsel, hereby stipulate and agree to extend the time for Plaintiff to file a Motion to Compel regarding Defendants' respective responses to Plaintiff's first set of discovery requests.

1. Defendants respectively began serving their answers and responses to Plaintiff's First Set of Interrogatories and Requests for the Production of Documents on October 12, 2021.
The last set of answers and responses by a respective Defendant to Plaintiff's First Set of Discovery Requests was served on October 22, 2021.
2. Under Local Rule 37.02(b), Plaintiff has 30 days after the discovery responses to file a Motion to Compel regarding each of Defendants' respective set of discovery responses.

3. Counsel for Plaintiff and Defendants have met and conferred and the parties are continuing to confer regarding their responses to Plaintiff's first set of discovery requests.
4. Parties stipulate and agree that Plaintiff shall have until December 13, 2021, to file any Motions to Compel regarding Defendants' responses to Plaintiff's first set of discovery requests. Parties further stipulate that Defendants will have until January 10, 2022 to file opposition responses to any Motions to Compel filed by Plaintiff.

Dated: November 11, 2021

Respectfully submitted by,

<p><u>/s/ John W. Barrett</u> John W. Barrett (WV Bar No. 7289) Jonathan R. Marshall (WV Bar No. 10580) Benjamin J. Hogan (WV Bar No. 12997) BAILEY & GLASSER LLP 209 Capitol Street Charleston, WV 25301 Telephone: 304-345-6555 Facsimile: 304-342-1110 JBarrett@baileyglasser.com JMarshall@baileyglasser.com BHogan@baileyglasser.com</p> <p>William Howard (admitted <i>pro hac vice</i>) THE CONSUMER PROTECTION FIRM 401 East Jackson Street, Suite 2340 SunTrust Financial Center Tampa, FL 33602 Telephone: 813-500-1500 Facsimile: 813-435-2369 Billy@TheConsumerProtectionFirm.com</p> <p>Yvette Golan (admitted <i>pro hac vice</i>) THE GOLAN FIRM 2000 M Street NW, Suite 750-A Washington, DC 20036 Telephone: 866-298-4150 ext. 101</p>	<p><u>/s/ Danielle Waltz</u> Danielle Waltz (WVSB #10271) Laura Hoffman (WSSB #12748) JACKSON KELLY PLLC 500 Lee Street East, Suite 1600 Charleston, WV 25301 Telephone: (304) 340-1000 Email: dwaltz@jacksonkelly.com Email: laura.hoffman@jacksonkelly.com</p> <p>Amy E. Richardson (admitted <i>pro hac vice</i>) HARRIS WILTSHIRE & GRANNIS LLP 1919 M Street, NW 8th Floor Washington, DC 20036 Telephone: (202)730-1329 Email: arichardson@hwglaw.com</p> <p><i>Counsel for Defendant Bandwidth Inc.</i></p>
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<p>Facsimile: 928-441-8250 YGolan@tgfirm.com</p> <p><i>Counsel for Plaintiff</i></p>	
<p><u>/s/ M. David Griffith</u> Bryant J. Spann (WVSB #8628) M. David Griffith, Jr. (WVSB #7720) THOMAS COMBS & SPANN, PLLC 300 Summers Street, Suite 1380 Charleston, West Virginia 25301 Phone: (304) 414-1800 Fax: (304) 414-1801 bspann@tcspllc.com dgriffith@tcspllc.com</p> <p>Ezra D. Church (admitted <i>pro hac vice</i>) Natalie M. Georges (admitted <i>pro hac vice</i>) MORGAN, LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103 Phone: 215.963.5710 Fax: 215.963.5001 ezra.church@morganlewis.com natalie.georges@morganlewis.com</p> <p><i>Counsel for Defendant Inteliquent, Inc.</i></p>	<p><u>/s/ Stuart A. McMillan</u> Stuart A. McMillan (WVSB #6352) Bowles Rice LLP 600 Quarrier Street Charleston, WV 25301 Phone: (304) 347-1110 Fax: (304) 347-1746 smcmillan@bowlesrice.com</p> <p>Russell S. Jones, Jr. (admitted <i>pro hac vice</i>) Robert V. Spake, Jr. (admitted <i>pro hac vice</i>) Elizabeth Marden (admitted <i>pro hac vice</i>) POLSINELLI PC 900 W. 48th Place, Suite 900 Kansas City, MO 64112 Telephone: (816) 753-1000 rjones@polsinelli.com rspake@polsinelli.com lmarden@polsinelli.com</p> <p><i>Counsel for Defendants CenturyLink Communications, LLC and Level 3 Communications, LLC</i></p>
<p><u>/s/ Jeffrey A. Holmstrand</u> Jeffrey A. Holmstrand (#4893) Jeffrey A. Grove (#6065) GROVE HOLMSTRAND & DELK, PLLC 44 ½ 15th Street Wheeling, West Virginia 26003 (304) 905-1961 jholmstrand@ghdlawfirm.com jgrove@ghdlawfirm.com</p> <p><i>Counsel for Defendant All Access Telecom, Inc.</i></p>	<p><u>/s/ Carrie Goodwin Fenwick</u> Carrie Goodwin Fenwick (WV Bar No. 7164) Goodwin & Goodwin, LLP P.O. Box 2107 Charleston, WV 25328-2107 (304) 346-7000 cgf@goodwingoodwin.com</p> <p>Lauri A. Mazzuchetti (admitted <i>pro hac vice</i>) Glenn T. Graham (admitted <i>pro hac vice</i>) Kelley Drye & Warren LLP One Jefferson Road, 2nd Floor Parsippany, NJ 60606 (973) 503-5900 (telephone) lmazzuchetti@kelleydrye.com ggraham@kelleydrye.com</p>

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